

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Dashawn A. LaRode

Plaintiff(s),

AFFIRMATION OF SERVICE

REC'D IN PRO SE OFFICE
JAN 13 '25 PM 4:54

-against-
JOHN ROSATTI, CEO
PLAZA AUTO MALL
Defendant(s).

24-CV-8622 (HG)()

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I Sage El, declare under penalty of perjury that I have
served a copy of the attached Motion for Default Judgment, Affirmation
in support of Motion for Default Judgment
upon John Rosatti
by mailing it to USPS Certified # 70210950000209524275

whose address is: 2740 Nostrand Avenue, Brooklyn, NY,
11210

Dated: 01-13, 2025
Central Islip, New York

By: Sage El
Signature

c/o: 388 East 49 Street
Address

Brooklyn, NY, 11203
City, State & Zip Code

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

(2)

Dashawn A LaRode

Plaintiff(s),

-against-

JOHN ROSATTI dba CEO
PLAZA AUTO MALL

Defendant(s).

MOTION FOR
DEFAULT JUDGMENT

24 CV 8622 (HG)

Plaintiff Dashawn LaRode hereby moves the Court pursuant to Federal Rule of Civil Procedure 55 (b) and Local Civil Rule 55.2 to enter default judgment in favor of plaintiff and against defendant(s) John Rosatti on the grounds that said defendant(s) failed to answer or otherwise defend against the complaint.

Dated: 01-13-2025

By. Dashawn L
(Signature)

By. Dashawn LaRode
Print Name of Plaintiff Pro Se

c/o. 851 Grafton St
Address

Brooklyn, New York republic
[11212]

TO: (Put Name and Address of
Each Defendant(s) or Defense Attorney)

1. John Rosatti
Plaza Auto Mall
2740 Nostrand Ave
Brooklyn, NY, 11210

2. Brian Moynihan
Bank of America
100 North Tryon St
Charlotte, NC, 28255

3. George Baddeen
NYCR Industries Corp
70 Plain Ave, New
Rochelle, NY, 10801

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
Dashawn A. LaRode

AFFIRMATION IN SUPPORT
OF MOTION FOR DEFAULT
JUDGMENT

Plaintiff(s)

JOHN ROSATTI, CEO
PLAZA AUTO MALL,

24 CV-8622 (HG)

Defendant(s).

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I, Dashawn LaRode hereby declares as follows:

1. I am the plaintiff in this action.
2. This action was commenced pursuant to 18 USC 894, 18 USC 8, 12 USC 83
28 USC 1331, FCRA & FDCPA
3. The time for defendant(s), John Rosatti, to answer or otherwise
01-08-2025
move with respect to the complaint herein has expired.
4. Defendant(s), John Rosatti, has not answered or otherwise
moved with respect to the complaint, and the time for defendant(s) John Rosatti
to answer or otherwise move has not been extended.

5. That defendant(s) John Rosatti default has been noted by the
Clerk of Court. A copy of the Certificate is attached hereto.

6. Defendant(s) John Rosatti is indebted to plaintiff,

I, Dashawn LaRode in the following manner (state the facts in support of the claim(s)):

The auto loan is defective on its face because of no seller signature
and they failed to disclose who is the original creditor on
the account. This constitute false, misleading and deceptive practices
of bait-and-switch tactics with hidden charges of \$5000 down, knowing
that the Finance loan amount is the total sum of the loan agreement

Due to non response to my dispute letter pursuant to (18 usc 894 & 12 usc 83) defendant is in default. The actual damages is in the amount (\$10,000,000.00) pursuant to (18 usc 1681 n (a)(1) and ~~(1692 k(a)(2)(A))~~ and 1692 k(a)(1). Statutory damages in the amount of \$5,000,000.00, pursuant to (18 usc 1681 n(a)(1) and (1692 k(a)(2)(A)). And Punitive damages in the amount (\$30,000,000.00 USD), with reasonable lawyer fees in the amount \$65,000.

WHEREFORE, plaintiff Dashawn LaRode requests that the default of defendant(s) John Rosatti be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part thereof has been paid.

Dated:

By: Dashawn LaRode
 (Signature)
 (Print Name of Plaintiff Pro Se) Dashawn LaRode
 (Address) 151 Grafton Street, Bklyn [11212]
 (Telephone Number)
 (E-mail address)